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Access to Telecommunications Services, Telecommunications Equipment, and Customer Premises Equipment By Persons with Disabilities

WT Docket No. 96-198

NOTICE OF INQUIRY

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REPLY COMMENTS OF JO WALDRON

I respectfully submit my reply comments on the aforementioned NOI, on behalf of extensive knowledge about not only the telecommunications industries, and the assisting devices arena, but also on the population of American's with Disabilities, and for myself, as a person who is totally off-the-chart deaf and with multi-disabilities.

In my initial comments filed on 28 OCT 96, I provided histrionic background information on the population of which Section 255 is designed to benefit. May I state, all that information is germane to the reply comments as they are to the original comments filed.

Therefore, I stand by my original comments and hope that FCC Commissioners will take them to heart.

Perhaps my comments mean even more, based on some of the filed comments that I have read. What a wide spectrum of interpretation of Section 255 as shown in the filed comments, not to mention a few wish lists that were above and beyond the parameters of 255.

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I believe the best way to respond to the filed comments is to simply give point summarization in a generalized means.

It must be referenced, the very best set of NOI Comments filed, in my opinion, is that of the National Council on Disability. As Disabled American, I strongly believe that all American's with disabilities would wholeheartedly support all that NCD has stated and supported in their Comments.

I would go so far as to say, that NCD's comments contain exactly those avenues that demand the support of FCC, and other avenues that demand consideration by FCC.

I would also state, that NCD as an organization is doing precisely that of which their charter dictates, the representation of all American's with Disabilities, and the access venues that allow all of us to participate in American society.

I applaud and deeply appreciate all the work that NCD did in preparation and issuance of their comments. Please read them, they are outstanding.

Out of all the comment documents that I could access electronically, NCD's is the most thorough, and knowledgeable of all comments filed.

Other organizations filed their comments, (again the one's that I could access electronically the FCC service for copies, is quite cost prohibitive for individuals wanting to respond, I am sure I am not the only one with this concern) certainly seem to be somewhat limited, not only in scope, but in recommendations or solutions.

I was amazed at what the interpretation of what was needed or asked for, generally was not commented on. Equally, full wide on comments I was amazed as how many entities were trying to re-write an existing federal law, rather than respond to what is the law.

I found it really interesting that those entities with interest concerns in the computer arena, were the very ones to state that Section 255 did NOT apply to them in regards to access issues. **THEY ARE WRONG.** I guess they don't realize that the current and next generation of people with disabilities have the right to participate in their NEXT generation of interactive products and services. Once again, we will not take the detour on the Information SuperHighway!

I am amazed at the entities who claim to be doing so much for people with disabilities, and paint such a tremendous picture, yet half of their claims are nothing but lip service, and certainly have not become a reality nor a benefit, to those they profess to serve.

I frown at the entities that supported the "voluntary arena basis" for compliance to Section 255. I guess they don't understand that federal law, is federal law. I applaud the wireless industry for all that they collectively have done in the past five years, all on a voluntary basis. They certainly have accomplish incredible things, for one.....accessible telecommunications.

They still have a ways to go, but the wireless industry on the whole is on the road to achievement.

The comments from the landline side of the house, were not impressive. These entities predominantly were the ones who wanted a major time frame to comply with Section 255, they want voluntary compliance, it really boiled down to all that they wanted, yet these same entities through their lobbyists, their legal counsels or department representatives were fully aware of Section 255 before it was ever signed into Law. Here we are, almost ten months later, and I for one do not know of one thing that landline companies have done to even try to address this section, let alone take a VOLUNTARY pro-active stand to do anything about it.

Rather support the need for rules and guidelines where needed, huh!

As to the comments from SHHH, I would offer some corrections to their statements:

1. Some companies provide external wired devices, which are basically retrofits.

This is incorrect. Scientific data supports that external devices not only provide total audio access, but at a much higher level of amplification and clarity than exists in any other mode. They are not retrofits in any thought of the definition. Any more so than utilizing a TTY with a wireless phone.

2. Volume control. Consumers with hearing loss repeatedly tell us they would like the capability to increase the volume beyond what is typically offered.

This is very true. Again, the scientific data supports that volume control and HAC perform at the same level, and that it will only benefit those with mild to moderate hearing loss. Also, most wireless phone have the solution of volume control option which indeed increases the volume to right at 30db of sound input.

3. Vibratory Alerts. Remote vibratory alerts would be preferred as women typically do not carry phones in their pocket but rather in a briefcase or purse.

A product called Silent Call is readily available solving this point, as so stated in the Communication Plan presented to FCC from the Hearing Aid Summit Conference Committees.

4. Digital Wireless Phones. Some companies are making available attachments, as interim solutions, to allow hearing aid wearers with telecoils to use the phones. This approach works for some people but not everyone as the interference is not always reduced with the attachment. Also the attachment is not convenient to use and does not provide equivalent access.

This is highly erroneous. Hundred's of SHHH members are currently using the "Attachment", as it completely eliminates the interference of the PCS phone/digital phone/analog phone/hearing aid arena.

Equally, they are impressed as they can actually hear clearly with the attachment, and access is better than they have ever experienced before.

Most people with hearing disabilities as so referenced in my original comments, with support data, do not benefit from hearing aid compatible, thus welcome the attachments that will allow them true access to wireless and wireline telecommunications.

5. TTY's need to be able to directly connect the TTY to digital phones.

This is so very true. This peripheral device is the oldest device known to the deaf and hard of hearing. What the problem is, as so stated in my comments is a connection cable, which would allow the RJ11 jack interconnection to occur between the TTY and the digital phone. Or a simplification would be with an analog phone.

The issue of Baudot mode is true. Personally, the TTY's have been around for over 50 years, I do believe that a lot of changes needed could be done very simply by the TTY manufacturer's.

6. Standardized Jacks. Many people who are hard of hearing use assistive listening device attachments to hear better on wireline phones. To ensure such access, a standardized jack outlet should be included in all phones to allow users to plug in these attachments.

The comments overall are very hard to follow due to lack of structure, but I believe the reference here was for wireless phones, not wireline phones. It is true that many people who are both deaf and hard of hearing benefit from ALD attachments for

wireless phones. The jacks for wireless phones have already been listed as criteria by CTIA for phone certification.

7. Non-modular phones. Again, I believe it is an issue of a "Family" of products to choose from, rather than making ALL phones accessible. I believe SHHH stated this in the beginning of their document, but it is so hard to follow. It must be stated that those individuals with cochlear implants also benefit from assisting listening devices/attachments via their auditory input selector.

8. 25. Again, I would refer to the actual scientific data as provided in my comments in regards to the true performance of hearing aid compatible phones. Equally, when one has the hearing aid on telecoil, one doesn't experience feedback, rather only when trying to place a telephone receiver on a hearing aid that is on normal audio level, does one get feedback.

Perhaps this is why most people who wear hearing do not wear hats, as one get the same feedback, when the hat gets too close to the hearing aid!

The TTY coding systems issue, must indeed be addressed. A standard would simplify this whole arena.

In regards to Nortel (Northern Telecom) comments, perhaps their idea of using Part 68 as the appropriate model for regulation of the manufacturers obligation has some merit.

Nortel refers that under this approach, a manufacturer would certify compliance with the Commission's guidelines as part of the equipment registration process., rather than create a new process for regulating manufacturer's compliance on Section 255.

This would not be confused as support of Part 68 in regards to wireless phones. The reality here is, one cannot manufacture most analog, and all digital, or PCS phones to be HAC. This is also in part to the functionality of the hearing aid itself. As I have stated before, scientific data supports that if more than a low powered hearing aid is used with a wireless phone, interference buzzing usually results.

And, once again, the issue is access. If one has interference, one does not have access.

This is particularly impactful when one considers the full realm of the Telecommunications for the Disabled Act of 1982, in regards to emergency telecommunications access. Which is interesting that no one short of NCD has brought to mind in this proceeding.

I would also reference the comments filed by the National Association for the Deaf, America's largest organization safeguarding the accessibility and civil rights of millions of deaf and hard of hearing Americans in education, employment, health care, and telecommunications.

NAD specifically mentions the Congressional phone confirmations of the intent of FCC to mandate for regulations of Section 255, and NAD's supporting documentation referencing this point.

I would support this fully, as I believe that NAD through their research, has indeed verified the intent of Congress.

For the most part I agree with NAD's comments, they like NCD have really done their homework. I would point out the marketing of information and products to the general public that NAD laid out, is of significant importance. It is real simple, if the general public does not know that they can access telecommunications then the return economics will not be reflected either. Thus, no one benefits.

In closing, I would have to reiterate that my original comments filed stand, and many points of clarification are offered within, especially in regards to other comments that have been filed.

Thank you for this opportunity to respond.

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